

22 December 1997

Re: NEPA Technical Inquiry 0202 - SOW for PCB Investigative Sampling

Dear NEPA Call-In User:

This letter is in response to your November 24, 1997 request for a sample statement of work (SOW) for PCB investigative sampling. You are aware of a GSA site where transformers suspected to contain PCBs have been dumped. You have also been told that the transformers are leaking. The site is a relay station located in an agricultural area. Specifically, you received a sample SOW for PCB Removal Actions in a previous technical inquiry (TI 200) from NEPA Call-In, and would also like a sample SOW for investigative sampling.

SUMMARY OF FINDINGS

NEPA Call-In is providing a SOW for "Title I (Preliminary Assessment/Site Inspection, Remedial Investigation/Feasibility study, RCRA Facility Assessment/Facility Investigation, Interim Remedial Action. etc.); Title II (Inspection, and/or Oversight of Restoration/Remediation Construction Related Projects, Associated With Their Designs, or Designs by Others, etc.)" We also provided the following by fax on November 25, 1997: "Preliminary Activities After Discovery of Abandoned Transformers," and a summary of the Environmental Protection Agency (EPA) PCB Spill Cleanup Policy.

DETAILED FINDINGS

NEPA Call-In contacted Mr. Jerris Harris, Pollution Prevention Directorate, Headquarters Air Force Center for Environmental Excellence (HQ AFCEE/EP), (210) 536-4219, for the requested SOW. AFCEE is the author of the PCB Removal Action SOW previously provided to you by NEPA Call-In. Mr. Harris did not have a SOW for investigative sampling, and referred us to Ms. Elsa Martinez, Secretary, Restoration Branch, AFCEE, (210) 536-5248. Ms. Martinez referred us to Mr. Gerry Saulnier, Technical Assistant, Restoration Branch, AFCEE, (210) 536-5201.

We contacted Mr. Saulnier who provided "Title I (Preliminary Assessment/Site Inspection, Remedial Investigation/Feasibility study, RCRA Facility Assessment/Facility Investigation, Interim Remedial Action. etc.); Title II (Inspection, and/or Oversight of Restoration/Remediation Construction Related Projects, Associated With Their Designs, or Designs by Others, etc.)" Mr. Saulnier stated he did not have a SOW specific to PCBs, as his office uses the above SOW for all investigative sampling actions. NEPA Call-In is enclosing this SOW on 3.5" diskette in Microsoft Word 6.0 format.

Finally, NEPA Call-In reviewed its files and located the EPA document, "PCB Q&A Manual," 1994 Edition. Chapter 14 discusses the Environmental Protection Agency (EPA) PCB Spill Cleanup Policy, which we faxed to you on November 25, 1997. According to the EPA PCB Spill Cleanup Policy, PCB spills which contaminate animal grazing lands are excluded from the policy. The policy further states: "For these 'excluded' spills, the responsible party shall report the spill to the Regional EPA Office and clean up the spill in accordance with site-specific requirements established by the EPA Regional Office." NEPA Call-In also prepared the document, "Preliminary Activities After Discovery of Abandoned

Transformers," which we faxed to you on November 25, 1997. NEPA Call-In could also develop a site specific sampling plan for your situation. In a follow up call to you, you stated you had already assigned the project to a local contractor and would have them develop the sampling plan. You also stated the information provided by NEPA Call-In was sufficient for your needs, but you would be interested to receive the SOW from AFCEE.

The materials in this TI have been prepared for use by GSA employees and contractors and are made available at this site only to permit the general public to learn more about NEPA. The information is not intended to constitute legal advice or substitute for obtaining legal advice from an attorney licensed in your state and may or may not reflect the most current legal developments. Readers should also be aware that this response is based upon laws, regulations, and policies in place at the time it was prepared and that this response will not be updated to reflect changes to those laws, regulations and policies.

Sincerely,

(Original Signed)

NEPA Call-In Researcher